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Our File No.: 114758

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

DARYL HUDSON, INDIVIDUALLY AND ON
BEHALF OF ALL OTHERS SIMILARLY
SITUATED,

Plaintiff,

vs.

ALPHA RECOVERY CORP AND JH
PORTFOLIO DEBT EQUITIES, LLC,

Defendant.

Docket No: 1:18-cv-01461-ILG-PK

MOTION FOR SETTLEMENT

Now comes the Plaintiff DARYL HUDSON by and through counsel, to provide notice to the Court that the present cause has been settled between the parties, and state:

1. A settlement agreement (“Agreement”) is in the process of being finalized. Once the Agreement is fully executed, and Plaintiff has received the consideration required pursuant to the Agreement, the parties will submit a Stipulation of Voluntary Dismissal *with prejudice* pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) and will therein request that the case be dismissed and closed.
2. The parties respectfully request that the Court stays this case and adjourns all deadlines and conferences.

3. We respectfully request the Court provide that the parties may seek to reopen the matter for forty-five (45) days to assure that the Agreement is executed and that the settlement funds have cleared.

DATED: April 6, 2018

Respectfully submitted,

By: /s David M. Barshay
David M. Barshay, Esq.
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